

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

In re: Eidos, LLC, Debtor-in-Possession.	Case No. 16-10385-BFK Chapter 11
In re: Eidos Partners, LLC, Debtor-in-Possession.	Case No. 16-10386-BFK Chapter 11
In re: Eidos Display, LLC, Debtor-in-Possession.	Case No. 16-10388-BFK Chapter 11
In re: Eidos III, LLC, Debtor-in-Possession.	Case No. 16-10389-BFK Chapter 11
In re: Eidos Advanced Display, LLC, Debtor-in-Possession.	Case No. 16-10390-BFK Chapter 11
In re: Eidos IV, LLC, Debtor-in-Possession.	Case No. 16-10391-BFK Chapter 11

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In re:

Kamdes IP Holding, LLC,

Debtor-in-Possession.

Case No. 16-10392-BFK

Chapter 11

**MOTION TO DISMISS CHAPTER 11 CASES UNDER 11 U.S.C.
§§ 305(a)(1) AND 1112(b) OR, ALTERNATIVELY, FOR RELIEF FROM
THE AUTOMATIC STAY**

Stairway Capital Management II L.P. (“Stairway”), through its undersigned counsel and pursuant to Sections 305(a)(1) and 1112(b) of title 11 of the United States Code, hereby moves to dismiss these bankruptcy cases. In support of this Motion, Stairway relies upon the accompanying Memorandum of Law in Support of this Motion (the “Memorandum”), as well as the declarations of John Rijo and Michael Sirota, Esq.¹ For the reasons set forth in the Memorandum, Stairway submits that these bankruptcy cases should be dismissed.

WHEREFORE, Stairway respectfully requests that the Court enter an Order: (i) granting this Motion; (ii) dismissing the above-captioned bankruptcy cases; and (iii) granting such other relief as the Court deems just and appropriate under the circumstances.

¹ Because the Memorandum and supporting declarations contain confidential information, unredacted versions of the Memorandum and declarations are being filed under seal and served only on the above-captioned debtors and the United States Trustee. Contemporaneously with the filing of this Motion, Stairway is filing a motion requesting Court approval to file the Memorandum and declarations under seal. Redacted versions of these pleadings are being served on all other creditors pursuant to Bankruptcy Rule 2002(a)(4).

Dated: February 9, 2016

COLE SCHOTZ P.C.

By: /s/ G. David Dean

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CERTIFICATE OF SERVICE

I, G. David Dean, hereby certify that on this 9th day of February, 2016, a copy of the foregoing **Motion to Dismiss Chapter 11 Cases under 11 U.S.C. §§ 305(a)(1) and 1112(b) or, Alternatively, for Relief from the Automatic Stay** (the “Motion”), along with the proposed order and redacted versions of the Memorandum and Declaration, was sent via first-class mail, postage prepaid to the parties on the attached Service List (Redacted Versions).

I hereby further certify that on this 9th day of February, 2016, a copy of the Motion, along the proposed order and unredacted versions of the Memorandum and Declarations, which are being filed under seal, was sent via first-class mail, postage prepaid to the parties on the attached Service List (Unredacted Versions).

Dated: February 9, 2016

/s/ G. David Dean
G. David Dean

Service List (Redacted Versions)

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Service List (Unredacted Versions)

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